



U.S. Department of Justice

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May 6, 2021

Quinn Alexandra Michaelis
73 W. Monroe
Chicago, IL 60603
Email: qmichaelis@yahoo.com

Re: United States v. Martin Crossley, 20 CR 369

Dear Ms. Michaelis:

During the trial of the above-captioned case, the government intends to present expert testimony as detailed below. Please consider this letter to be the government's formal notice pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G) of the government's intention to call the following witness:

Special Agent Jeremy Bauer of the Federal Bureau of Investigation

The government intends to call Special Agent Jeremy Bauer to testify regarding the historical cell site analysis he performed to determine the use and general location of the following cellular telephone:

Phone Number	User
(630) 660-0402	Martin Crossley

The government anticipates that Special Agent Bauer's testimony will include statements about how cell phone towers operate. Special Agent Bauer will testify consistent with his report, draft charts, and maps, and the historical cellular phone data provided to defendants in discovery. The government will produce a draft of Special Agent Bauer's report and accompanying materials subject to your agreement that this information will be used for pretrial purposes only and that you will not seek to rely on it at trial for cross-examination or any other purpose.

Specifically, Special Agent Bauer will provide his opinion as to the general areas in which the cellular telephone was located on the relevant date and time of the robbery as identified in the indictment as well as dates adjacent to the robbery date based. That testimony will rely on information furnished by a wireless phone

service provider concerning which cell towers the above cellular telephone connected with during those times. Special Agent Bauer will also testify regarding which cell tower sectors were utilized for the relevant calls close in time to the robbery and explain that the direction of the cell tower sector utilized for any particular call can indicate the general location of the cell phone relative to the tower utilized for the call.

The data supporting Special Agent Bauer's opinions is located in the files of the cell phone records provided by T-Mobile and previously produced in discovery including on September 3, 2020, and January 11, 2021.

Finally, Special Agent Bauer has testified as an expert witness on historical cell site analysis in federal court and state court on a number of occasions, as detailed in Special Agent Bauer's CV, which is included with this letter.

The government continues to evaluate whether any additional expert witnesses will be needed for the trial and will update this disclosure if appropriate.

Finally, as requested in the government's letter of September 3, 2020, please provide written summaries of any expert opinions that defendant intends offer at trial as required by Rule 16(b)(1)(C).

Please contact me if you have any questions.

Very truly yours,

JOHN R. LAUSCH, JR.
United States Attorney

By: /s/ Michael J. Kelly
Michael J. Kelly
Timothy Storino
Assistant United States Attorneys